

DOCKET FILE COPY ORIGINAL

RECEIVED

JUN - 7 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Before the  
Federal Communications Commission  
Washington, D. C. 20554

In the Matter of )  
 ) CC Docket No. 92-237  
Administration of the ) Phases One and Two  
North American Numbering Plan )

Comments of the  
Ameritech Operating Companies

I. Introduction and Summary

The Ameritech Operating Companies<sup>1</sup> file these Comments in response to the Notice of Proposed Rulemaking released by the Commission in the above captioned docket on April 4, 1994.<sup>2</sup> The Commission's tentative conclusions in the Numbering NPRM are generally consistent with positions previously developed through industry forums and proposed by Ameritech, both in this docket and in its Customers First Proceeding before the Commission.<sup>3</sup> Ameritech therefore generally supports the Commission's findings in the Numbering NPRM, subject to clarifications and modifications in the following sections.

The Commission raises several new issues in the Numbering NPRM, including the transition period for the conversion to 4-digit Carrier Identification Codes ("CICs") and presubscription for interstate, intraLATA traffic. Ameritech will show that a thirty-six month conversion period will provide adequate time for carriers to convert their networks and customers to

---

<sup>1</sup> The Ameritech Operating Companies include: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

<sup>2</sup> In The Matter Of Administration of the North American Numbering Plan, CC Docket No. 92-237, Notice of Proposed Rule Making, Adopted March 30, 1994 ("Numbering NPRM").

<sup>3</sup> In the Matter of a Petition for a Declaratory Ruling and Related Waivers to Establish A New Regulatory Model for the Ameritech Region, DA 93-481 ("Customers First").

No. of Copies rec'd  
List A B C D E

629

the new 4-digit CIC format, while avoiding unnecessary administrative burdens, the possibility of a CIC exhaust and placing new carriers and their customers at an artificial disadvantage to established carriers with 3-digit CICs.

Ameritech will also show that presubscription for interstate, intraLATA traffic at this time will reduce competition and customer choice by effectively eliminating Regional Bell Operating Companies ("RBOCs") as a provider of this traffic. Competition for this traffic has flourished without presubscription. Also, handling the small volume of interstate, interLATA traffic separately from the much larger volume of intrastate, intraLATA traffic would cause customer confusion, excessive costs and undue administrative problems.

## II. Responses to Conclusions

In this section, Ameritech will provide its positions on the tentative conclusions of the Commission in the Numbering NPRM. Most of the issues covered by the Numbering NPRM were previously fully addressed by Ameritech in the pleadings that it previously filed in this docket<sup>4</sup> and in the Customers First Proceeding. Rather than repeat its arguments and reasoning here, Ameritech will summarize its position and attach its relevant previous pleadings. Ameritech will also provide further elaboration on selected issues in the Numbering NPRM and address new issues and questions raised by the Commission.

1. Ameritech supports the Commission's proposal to transfer administration of the North American Numbering Plan ("NANP") to

---

<sup>4</sup> In The Matter Of Administration of the North American Numbering Plan, CC Docket No. 92-237, Notice of Inquiry, 7 FCC Rcd 6837 (1992), Comments of Ameritech, filed December 28, 1992.

a non-governmental third-party entity.<sup>5</sup> Ameritech endorses the work of the Future of Numbering Forum ("FNF") on the process for the transfer of the NANP administration responsibility to a new entity and recommends that the Commission adopt the FNF World Zone 1 Numbering Organization structure as the model. Ameritech supports reconvening FNF for the purpose of further addressing this issue. Ameritech also supports the Commission's proposal to focus its resources on numbering policy issues and oversight, while leaving numbering ministerial functions to the NANP administrator and to the industry.<sup>6</sup>

2. Ameritech supports the establishment of an open oversight committee to develop, supervise and interpret number assignment guidelines under the oversight of the Commission, and to supervise the NANP administrator.<sup>7</sup> The committee should be open to all interested industry participants and operate through consensus process.<sup>8</sup>
3. The Commission should establish a special mechanism dedicated to recovering its numbering oversight costs and the costs of the number assignment administrator. The mechanism should recover numbering costs from the cost causers in a competitively neutral manner based on their use of the numbers involved and the

---

<sup>5</sup> NPRM, at 7 (para. 18).

<sup>6</sup> NPRM, at 8 (para. 24).

<sup>7</sup> NPRM, at 8 (para. 25).

<sup>8</sup> As suggested by the Commission, ATIS would be an appropriate sponsoring organization. NPRM, at 6 (para. 15).

costs they cause. For that reason, the recovery mechanism should not be used to raise funds for other purposes.

4. Ameritech supports the Commission's conclusion that the industry's current CIC expansion plan is reasonable and should be implemented without delay.<sup>9</sup>
5. Ameritech supports the Commission's proposal to defer the transfer of NANP assignment function until at least six months after completion of the conversion of Interchangeable Number Plan Area codes ("INPA").<sup>10</sup>
6. Ameritech supports the Commission's proposal to reject mandatory alternative dispute resolution and arbitration as vehicles to resolve numbering-related disputes.<sup>11</sup> An effective industry process will incorporate dispute resolution procedures.<sup>12</sup>
7. Ameritech supports the Commission's conclusion that the NANP should continue to be an integrated plan covering all of World Zone 1.<sup>13</sup> For that reason, any changes in the current NANP assignment policies, administrator, or funding should be supported by each nation in World Zone 1. Funding responsibility also should be equitably shared by carriers throughout World Zone 1.
8. Ameritech supports the Commission's proposal to transfer of the local C. O. code assignment function from the predominant local

---

<sup>9</sup> NPRM, at 17 (para. 50).

<sup>10</sup> NPRM, at 7 (para. 17).

<sup>11</sup> NRPM, at 8 (para. 22).

<sup>12</sup> E.g., the T-1 committee structure has an integral dispute resolution process, as described in its Procedures Manual; see Accredited Standards Committee T1-Telecommunications, Procedures Manual, Article XIII, Appeals.

<sup>13</sup> NPRM, at 4 (para. 9).

exchange carrier ("LEC") in each Numbering Plan Area ("NPA") to a third party.<sup>14</sup> Ameritech is currently working with the state commissions with jurisdiction over the states it serves to develop plans for this transfer. Any plan to transfer the C.O. Code assignment function should recognize the local character and overriding state interest in this function.

9. Ameritech supports the Commission's conclusion that PCS-related numbering issues should be separately handled in the Common Carrier Bureau's pending inquiry into these matters.<sup>15</sup>
10. Ameritech actively supports continuing industry efforts, such as those currently underway at INC, to develop local number portability options. Ameritech therefore supports the Commission's conclusion that more study of the technical, cost, demand and benefits of various local number portability options are required before any decision can be made on mandating any local number portability option.<sup>16</sup>

### III. Responses to New Questions and Further Elaboration

In the following section, Ameritech will present a complete discussion of its position on new issues and questions raised by the Commission in the Numbering NPRM.

#### A. Local Dialing Plans Should Reflect Local Policies

---

<sup>14</sup> NPRM, at 10 (para. 29).

<sup>15</sup> Commission Requests Comment on Proposed Assignment of the 500 Service Access Code for Personal Communications Services, Public Notice, Mimeo 34306 (released Aug. 5, 1993).

<sup>16</sup> NPRM, at 15 (para. 44).

The Commission asks for comments regarding the issue of differences among local dialing arrangements in each NPA.<sup>17</sup> The issue was raised by Ad Hoc in its earlier comments in this docket. As the Commission recognizes, dialing plans involve issues that are local and exchange in nature and have traditionally been subject to state regulatory oversight.<sup>18</sup> Therefore, the dialing plan in each NPA is developed under the oversight of the state commission involved and is carefully designed to accommodate local conditions and implement local regulatory policies. Local dialing plans should continue to reflect local conditions and policies.

Any problems arising from the fact that uniform dialing plans do not exist in each NPA are far outweighed by the cost and confusion of changing the existing plans in each NPA to some national plan. Dialing plan changes necessary to accommodate INPA have already been implemented in 9 NPAs within the region served by Ameritech and the remaining NPAs are already in a permissive dialing period in preparation for a 1/1/95 conversion to INPA.

To require additional changes in the dialing plans being used to implement INPA at this late date, would cause severe confusion, inconvenience and expense. It is also not clear that all the necessary work could be completed by January 1, 1995, even if such work were ordered in the next several months.

However, Ameritech supports NARUC's proposal of a minimum standard dialing plan to be used a model in each state where consistent with local requirements.

---

<sup>17</sup> NPRM, at 15 (para. 43).

<sup>18</sup> Id.

- B. The commission is correct to express concerns regarding the length of the CIC conversion period.

A 4- digit CIC conversion period of 6 years is longer than is necessary to prevent undue customer and carrier inconvenience, will inflate administrative costs, cause network inefficiency and place new carriers at a competitive disadvantage. Ameritech supports a CIC transition period of 36 months.

The CIC transition period refers to the period of time after 4-digit CICs become available during which carriers with existing codes must convert their existing 3-digit CICs to new 4-digit CICs. During the transition period, customers could dial either the existing 3-digit CIC (by dialing a 5-digit CAC 10XXX or the new 4-digit CIC by dialing a seven digit CAC 101XXXX.) As a matter of principle, Ameritech supports the concept of a transition period that is long enough to permit implementation of new codes in the network and education of customers. However, that transition period should be limited to the minimum period necessary for the carriers to reasonable perform those functions without undue cost or hardship.

First, simultaneous use of both 3-digit and 4-digit CICs would be confusing to customers and would place carriers and customers required to use 4-digit at a disadvantage. There is no question that 3-digit CIC are more convenient to use since, as discussed above, they require the dialing of 2 less digits (10XXX vs. 101XXXX). This distinction between carriers and customers should be eliminated as soon a practical.

Balancing all the considerations, Ameritech believes that a 36 month transition period is reasonable. Thirty-six months is an adequate period for the industry to educate their customers to the new 4-digit CICs format, while at the same time expeditiously eliminating the burden and expense of

supporting duplicate tables. At the same time, the supply of initial CIC will last for 36 months and that period is short enough that it will not convey a significant long term advantage to any carrier or customer group.

Second, during the transition, LECs must maintain two translation tables in all switches -- one for the 4-digit CICs and one for the 3-digit CICs. Maintaining two tables, one for 3-digit CICs and one for 4-digit CICs would clearly create added administrative burdens.

C. Ameritech generally supports the structure of the World Zone 1 Numbering Organization as developed by the FNF. This structure separates the administration and numbering policy functions.

The administration of the NANP should be via an independent, third party selected by the industry through an RFP process. The administration would be responsible for the ministerial numbering functions and would follow industry developed guidelines and numbering policy. The administration would receive guidelines from an industry Oversight Committee.

The Oversight Committee would act as an umbrella for all NANP related activities and operate under the oversight of the Commission. The Oversight Committee's responsibilities would include the 1) development of numbering policy, and 2) the development and interpretation of assignment guidelines and plans. The OC should be open to all interested participants and should operate through a consensus process. Ameritech continues to support the use of the industry forum process to resolve both technical and policy issues wherever possible.<sup>19</sup>

---

<sup>19</sup> The Carrier Access Code (CAC) is the dialing sequence used to access a preferred provider of service. The CAC dialed with a 3 digit CIC is 10XXX; the CAC dialed with a 4 digit CIC is 101XXXX.

D. Ordering Presubscription for intraLATA traffic Before the Lifting of the InterLATA Prohibition on the RBOCs Would Work to the Severe Disadvantage of Customers.

The Commission has requested comment regarding the timing, costs and benefits of modifying the current LEC treatment of intraLATA interstate toll traffic.<sup>20</sup> These issues do not appear to be related to this docket's central issues of NANP Administration; thus, they should not be treated in a tangential manner by consideration here. Ameritech strongly urges that no action be taken along the lines suggested without the benefit of full review in the broader context of competition for all toll traffic, such as that presented by Ameritech's Customers First proceeding currently pending before the Commission.

In general, separate treatment of the related topics of intraLATA and interLATA competition would have many undesirable consequences. Opening up the intraLATA interstate toll marketplace to competition without simultaneously permitting Ameritech (and the other RBOCs as well) to enter the interLATA marketplace would be particularly harmful for a number of reasons.

The intraLATA toll marketplace is currently competitive, as shown by the advertising now used by interexchange carriers.<sup>21</sup> No stimulation by imposing a new presubscription requirement on this traffic is needed.

---

<sup>20</sup> NPRM, at 20 (para. 58).

<sup>21</sup> See Attachment A for typical examples of current IXC advertising campaigns in the region served by Ameritech. The competitive nature of this marketplace is also discussed in various materials filed in the Customers First proceeding; see, e.g., Attachments C and D to Ameritech's Customers First Reply Comments, filed July 12, 1993.

It is also widely acknowledged that customers much prefer a "one-stop shopping" capability in the telecommunications marketplace. If the RBOCs continue to be precluded by continuation of the MFJ restriction from offering interLATA calling capabilities while they are forced to further open the competitive intraLATA calling marketplace to service providers who are capable of offering both intra- and interLATA services, new entrants into the local exchange marketplace would be artificially awarded a competitive advantage. This would preclude the development of true competition on the basis of economic efficiency and superior ability to identify and serve customer needs, and would thus distort the workings of the marketplace. Precluding full RBOC participation in this manner would also deprive the customers of the benefits of price and service competition which would result from a truly competitive marketplace.

In addition, the RBOCs would undoubtedly experience the adverse financial impact of permitting the competitors thus advantaged to "cream-skim" the most financially-attractive intraLATA traffic by targeting customers with attractive calling patterns and traffic levels.

Furthermore, under such an uneven, artificial competitive framework, other carriers would have the incentive to make investments which would otherwise be economically unjustified, increasing overall costs to customers. Once such artificial advantages are given to a particular set of carriers, it can be very difficult to modify such a structure at a later date; thus, uneconomical industry investment patterns would likely be perpetuated by such a structure.

Presubscription for interstate intraLATA traffic should be consistent with subscription for corresponding intrastate intraLATA traffic. Both interstate and intrastate intraLATA traffic are local in character, use the

same facilities and tend to be made by the same customers. In order to prevent customer confusion, reduce costs, and increase network efficiency, both interstate and intrastate intraLATA traffic should use a common methodology in each state. Since the volume of intrastate intraLATA traffic is much larger than the volume of interstate intraLATA traffic and in recognition of the local in character of the traffic involved, the Commission should rule that interstate intraLATA traffic subscription should be consistent with the handling of intrastate intraLATA traffic in the state involved.

#### IV. Conclusion

For the foregoing reasons, the Commission should take the actions described herein regarding administration of the NANP.

Respectfully submitted,

By: Larry A. Peck  
Larry A. Peck  
Frank Michael Panek

Attorneys for Ameritech  
2000 W. Ameritech Center Dr.  
Hoffman Estates, IL 60196-1025  
(708) 248-6074

June 7, 1994

# Savings Notification

**MCI**

**MCI makes it simple to save on regional toll calls!**

Cleveland OH 44107-5926

|||||



Dear Ms. Heathrington:

Because you're a valued MCI® customer, we want you to be the first to know the good news — Now you can use MCI instead of your local phone company for regional toll calls — and save up to 29% over local phone company rates!\*

It's easy to save on regional toll calls with MCI. Here's all you do: Anytime you'd normally dial "1" before a long-distance phone number within your regional calling area, just dial "10 + 222" plus the 11-digit number (for example, 10 + 222 + 1 + 216 + 555-1234). And instead of being charged by your local phone company for these calls, you'll automatically enjoy MCI's lower rates!

We've enclosed a map which highlights your regional calling area. Now you can save on all your regional toll calls within that area simply by calling with MCI! When calling outside your regional calling area, you should continue to dial as usual, to keep saving with MCI.

To help you remember to use this simple "10 + 222" step when you make a regional toll call, we've enclosed some handy "peel-off" stickers. Place them on your phone, in your address book, or anywhere else to remind you to dial "10 + 222" first — and save!

If you have any questions, just call us toll-free at 1-800-556-7367.

Sincerely,

Mark T. Wiley  
Customer Service Benefits Advisor

P.S. With Friends & Family,® you'll also get an extra 20% off calls to other MCI customers in your Calling Circle® — including regional toll calls when you use MCI by dialing "10 + 222" first. It's easy to start or update your Circle — just call 1-800-556-7367.

\*See savings chart below.

## Look how much you can save on regional toll calls by dialing "10 + 222" first.

Call	Ohio Bell	MCI	% Savings	Friends & Family	Savings with Friends & Family
Cleveland to Ashtabula Night/Weekend:	\$0.51	\$0.45	11%	\$0.36	29%
Cleveland to Elyria Day:	\$1.22	\$0.86	29%	\$0.69	43%
Night/Weekend:	\$0.51	\$0.44	13%	\$0.35	31%

Charges are based on 3-minute calls using MCI Dial 1 service rates proposed effective 10/1/94 and the Ohio local telephone company rate table. Friends & Family discounts apply to all calls to MCI customers in your Calling Circle.

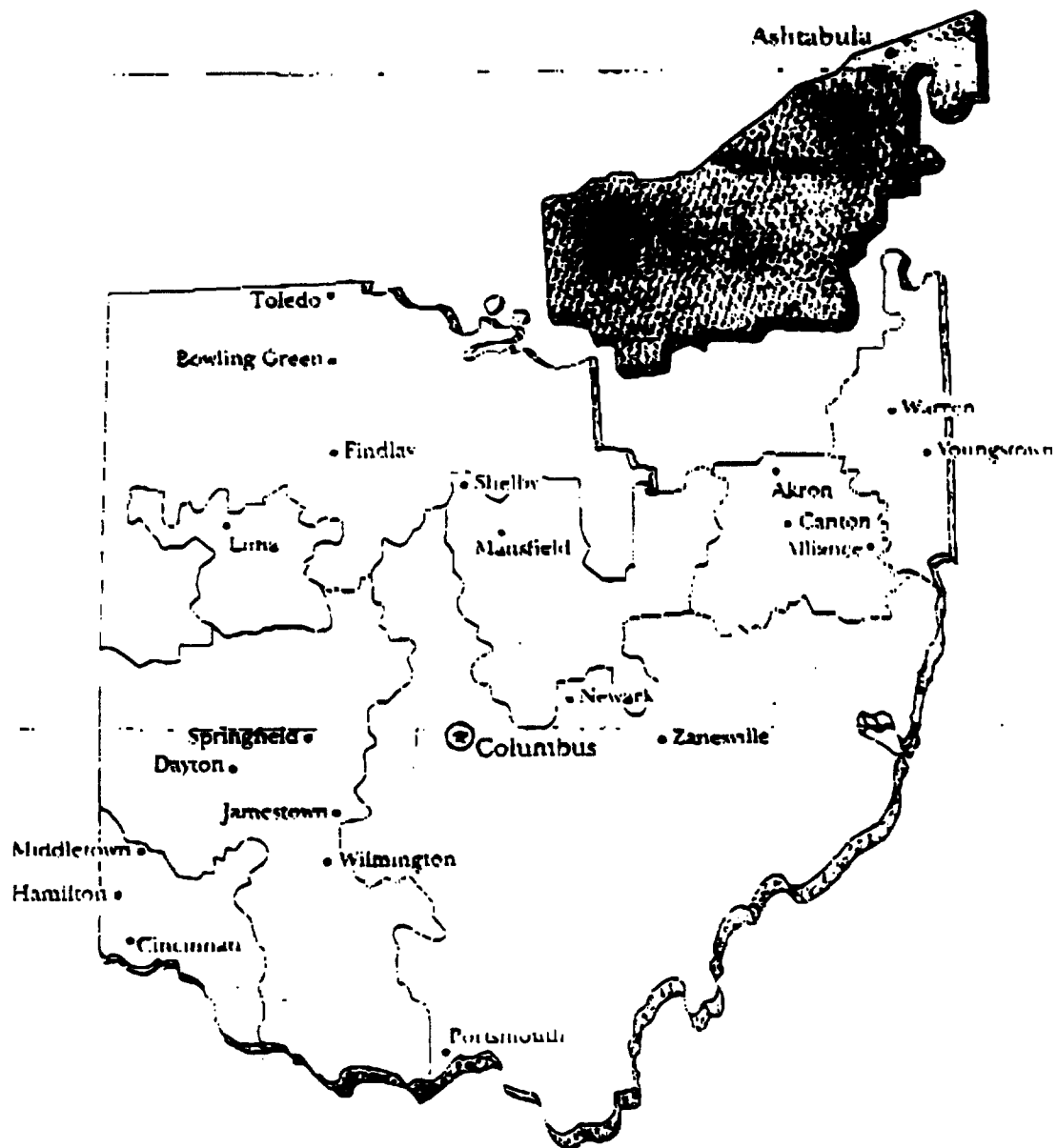


# our regional calling area

**MCI**

**MCI makes it simple to save on regional toll calls!**

**Make a regional toll call in the highlighted area  
and save up to 29%  
over your local phone company rates!**



## Instructions:

Dial

**1 0 3 6 8**

+1 + Area Code  
(if required) and the  
Number of the person  
you are calling.

For More Information  
Call Customer Service  
1-800-251-0680

**Budget Call**

LONG DISTANCE, INC.

## One Step Savings:

Using Budget Call is so easy.  
Simply dial 10368 BEFORE  
you dial the 1, Area Code,  
and number you wish to call.  
It's that simple.

## How does it work?

You must dial 10368 before  
each long distance call. This  
tells our billing computer that  
you want to be charged at  
the discounted Budget Call  
rates. Calls made using the  
10368 number will appear on  
the Budget Call page of your  
regular phone bill.

**Budget Call**

**10368 Features**

Now, receive a discount on your long distance calls - including every toll call over 23 miles, International and Directory Assistance calls - all without having to cancel your current long distance carrier.

*Savings*

- \* Save 10-21% off AT&T's standard direct dial rates
- \* No monthly fees, minimums or service charges
- \* Savings apply all the time - 7 days a week - 24 hours a day not just evenings and weekends

*Convenience*

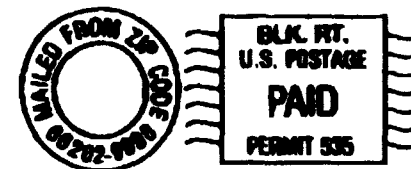
- \* No separate bill... calls are billed on your local phone bill
- \* No additional checks to write
- \* There is nothing to sign, nothing to switch

**Budget Call is available on your phone right now!**

Budget Call is not affiliated with Ameritech or Cincinnati Bell. AT&T is a registered trademark.

# **Budget Call**

LONG DISTANCE, INC.  
3441 West Henrietta Road  
Rochester, NY 14623



---

## **Now, the easiest way ever to save money.**

---

**Budget Call Phone Stickers Enclosed.**

\*\*\*\*\*WS CAR-RT SORT \*\* CR11  
2A 440 0195  
JEAN D ASMONDY

CLEVELAND OH 44144-3863

# **Budget Call**

LONG DISTANCE, INC.

## **Discounted Long Distance Rates Are Now Available On Your Telephone**

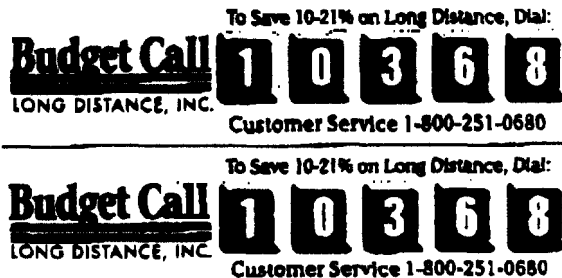
Dear Telephone Customer:

Good News! Now, you can receive a discount on all your long distance calls without canceling your existing long distance service. With Budget Call, anyone within the Ohio Ameritech or Cincinnati Bell calling areas can enjoy **guaranteed savings of 10-21% off AT&T's standard direct dial rates** on their long distance calls.

***All you have to do is dial 10368 before you make a long distance call.***

With Budget Call you save in even more ways. Budget Call discounts every toll call over 23 miles, as well as International and Directory Assistance calls. And for your convenience, your Budget Call long distance charges will appear on your regular phone bill. There are no extra bills to pay or checks to write.

Your savings are AUTOMATIC. Discounts apply 7 days a week, 24 hours a day. There is no monthly service charge... no minimum number of calls to make. You are only charged for those calls you make. *Best of all, you don't have to sign up for this service... you have it right now! Try it.*



Peel off these handy reminder stickers & place them on your telephones

**Just Dial 10368 + 1 + Area Code & Phone Number**

We know that you will be pleased with the quality of our fiber-optic network as well as the extra savings you will receive. Our customer service representatives are available to answer any questions you might have about using your Budget Call 10368 Access Number. Please call us Toll Free at 1-800-251-0680 for more information or to compare our rates to whatever plan you might be using. We'll show you how easy it is to start saving right now.

Sincerely,

Donna L. Reeves  
Vice President

P.S. Remember, you must dial 10368 before making every long distance call to get these special savings. If you need additional stickers or have any questions regarding your new service, call us Toll Free at 1-800-251-0680.

Customer Service Center 3441 West Henrietta Road Rochester, NY 14623

Budget Call is not affiliated with Ameritech or Cincinnati Bell.

AT&T is a registered trademark of American Telephone and Telegraph Company.

Introducing the smart way to save on  
calls from home in Chicagoland.

10-  
ATT

Dial it and save.

Now you can save up to 10% on calls over  
15 miles within the 708 and 312 area.\*

Check your phone bill. You may be surprised  
at how much you're paying for some calls from  
home. You'll probably be surprised to learn that  
you now have a way to save on these calls.

Now when you're calling from home,  
just dial 10-ATT first when making a call  
over 15 miles within the 708 and 312 area,

and you can save up to 10%.

**10-ATT + the number.** It's that simple. You  
can dial it right now. No hassle. No monthly fee.

If you have questions about whether or  
not 10-ATT applies to calls you make, call  
1-800-282-4212, ext. 65100. We'll let you know  
if you can start saving 10% right away.

AT&T is bringing quality and savings even  
closer to home.

**ATTN: Your True Voice.™**



Save on long distance calls.  
Use the **Thrifty Call<sup>SM</sup>**  
**Long Distance Access Number.**

---

DIAL  
**10923**  
+1 + area code (if required) + telephone  
number of the person you are calling.

---

**Thrifty Call<sup>SM</sup>**  
1-800-554-3057

*Peel-off sticker for your telephone book.*

Use the Thrifty Call<sup>SM</sup>  
Long Distance Access Number.

---

DIAL  
**10923**  
+1 + area code (if required)  
+ telephone number of the  
person you are calling.  
**Thrifty Call<sup>SM</sup>**  
1-800-554-3057

Use the Thrifty Call<sup>SM</sup>  
Long Distance Access Number.

---

DIAL  
**10923**  
+1 + area code (if required)  
+ telephone number of the  
person you are calling.  
**Thrifty Call<sup>SM</sup>**  
1-800-554-3057

*Peel-off stickers for your telephones.*

To use the **Thrifty Call<sup>SM</sup>**  
**Long Distance Access Number**,  
you simply:

DIAL  
**10923**

+1 + area code (if required)  
+ telephone number of the  
person you are calling.

Save 10% to 21% on your long  
distance calls, simply by using  
your **Thrifty Call<sup>SM</sup> 10923**  
**Long Distance Access Number**.

**Thrifty Call<sup>SM</sup>**

• **No separate bill.**

• **Ameritech customers:**

The calls you place using our service will be billed on the Thrifty Call<sup>SM</sup> portion of your regular monthly telephone company statement.

• **GTE customers:**

The calls you place using our service will be billed on the Thrifty Call<sup>SM</sup> portion of your regular monthly telephone company statement.

• **United customers:**

The calls you place using our service will be billed on the Thrifty Call<sup>SM</sup> portion of your regular monthly telephone company statement.

• You do not sign up to use the **Thrifty Call<sup>SM</sup> 10923 Access Number**.

• No monthly service charges. No minimum number of calls required.

• You are only charged for the calls you make, and those are discounted.

• Any long distance call over 23 miles will be 10% to 21% less than the standard direct dial rate you pay your local telephone company or AT&T\*.

• Out-of-state and Canadian calls are 10% lower than the standard direct dial rate charged by AT&T\*.

• Calls are discounted 24 hours a day, 7 days a week.

It's easy to save money on your long distance calls  
without having to cancel your current long distance carrier.

The **10923 Access Number**  
will work on your telephone right now!  
Why not use it?

**Thrifty Call<sup>SM</sup>**  
**1-800-554-3057**

\*AT&T is the registered trademark of American Telephone and Telegraph Company.  
Thrifty Call<sup>SM</sup> is not affiliated with Ameritech, GTE or United Telephone Companies.

# **Thrifty Call**

Customer Service Center  
500 Carlson Circle  
San Marcos, Texas 78666

BULK RATE  
U.S. POSTAGE  
**PAID**  
Permit # 711  
Fort Worth, Texas

---

**Now, the easiest way ever to save money.**

---

Thrifty Call phone stickers enclosed.

CAR-RT SORT

\*\*WSCR22

CLEVELAND OH

44 145

**NOW IN SERVICE FOR  
Ameritech GTE United  
TELEPHONE CUSTOMERS**

**Thrifty Call<sup>SM</sup>**  
**10923 Access Number**

Dear Ohio Telephone Customer:

The **Thrifty Call<sup>SM</sup> 10923 Access Number** is now in service for most Ohio telephone customers. When you use our access number, your Ohio long distance calls will be 10% to 21% less than the standard direct dial rate you pay your local telephone company or AT&T\*. Out-of-state and Canadian calls will be 10% less. These discounts apply to any long distance call over 23 miles!

There is no separate bill when you use the **Thrifty Call<sup>SM</sup> 10923 Access Number**. The calls you place using this number will appear on the Thrifty Call<sup>SM</sup> portion of your regular monthly local telephone company statement.

- There is no minimum number of calls required and no monthly service charges.
- The discounts apply 24 hours a day, 7 days a week.
- You do not sign up to use the Thrifty Call<sup>SM</sup> 10923 Access Number.  
There is no need to cancel your current long distance company.
- No separate bill. The calls you place using the Thrifty Call<sup>SM</sup> 10923 Access Number will appear on the Thrifty Call<sup>SM</sup> portion of your regular monthly telephone co. statement.
- The **Thrifty Call<sup>SM</sup> 10923 Access Number** will work on your telephone right now!  
Why not use it?

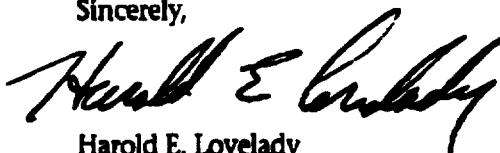
Simply dial 10923 first, then dial as you usually do.

**Dial 10923 + 1 + Area Code + Telephone Number Of The Person You Are Calling**  
(if required)

We know that you will be pleased with the quality of our fiber-optic network, and especially the savings you will receive on your long distance calls. Our Customer Service Representatives are trained to answer any questions you may have about using Thrifty Call<sup>SM</sup>, and they can be reached toll-free at 1-800-554-3057.

Remember, to begin receiving these savings on your long distance calls, **simply dial 10923 first, then dial as you usually do.**

Sincerely,



Harold E. Lovelady  
President, Thrifty Call<sup>SM</sup>

P.S. Be sure to put the enclosed Thrifty Call<sup>SM</sup> stickers on your telephones and phone book cover for handy reference. If you need additional stickers or would like us to compare our rates, especially if you are enrolled in an hourly long distance program, please call our Customer Service Department toll-free at 1-800-554-3057.

Before the  
Federal Communications Commission  
Washington, D. C. 20554

In the Matter of	)	
	)	CC Docket No. 92-237
Administration of the	)	Phases One and Two
North American Numbering Plan	)	

**COMMENTS OF THE AMERITECH OPERATING COMPANIES**